

# EXHIBIT B

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RASIER, LLC; and RASIER-CA, LLC

14 [Additional Counsel Listed on Signature Page]

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 IN RE: UBER TECHNOLOGIES, INC.,  
20 PASSENGER SEXUAL ASSAULT  
21 LITIGATION

22 This Document Relates to:  
23 ALL ACTIONS

Case No. 3:23-md-03084-CRB

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28 **DECLARATION OF JENNIFER  
HANDLEY IN SUPPORT OF  
DEFENDANTS' MARCH 17, 2025 BRIEF  
PURSUANT TO SPECIAL MASTER  
ORDER NO. 2, § III(6)**

**DECLARATION OF JENNIFER HANDLEY**

I, Jennifer Handley, having personal knowledge of the following state:

1. I am the Senior Legal Director, Global Safety, at Uber. I was first employed by Uber  
2 in December 2018 and have worked as in-house counsel for the past 6 years. My previous roles  
3 include Senior Counsel, Safety and Legal Director, Safety. In my current role, as has been the case  
4 throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and  
5 employees related to safety issues, procedures, and policy, among other legal advice. I offer this  
6 Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier,  
7 LLC, and Rasier-CA, LLC's March 17, 2025 brief pursuant to Special Master Order No. 2, § III(6)  
8 (ECF 2357). The facts set forth herein are true and correct and are based on my own personal  
9 knowledge, and I could and would competently testify thereto if called.

2. I have reviewed the document identified in the privilege log as  
3 JCCP\_MDL\_PRIVLOG014737. It is a draft Executive Summary for Uber's Safety Report dated  
4 November 13, 2019 and marked "Attorney-Client Privileged and Confidential/Prepared at the  
5 direction of counsel." This draft document discusses Uber's safety policies and practices. Given the  
6 legal risks of public statements regarding safety issues, a team of Uber's in-house attorneys, including  
7 myself, directed and coordinated the drafting of the Safety Report, including the Executive Summary.  
8 Uber's in-house attorneys directed and coordinated this effort to facilitate the provision of legal advice  
9 on the statements in the then draft report. Uber's in-house attorneys did, in fact, provide legal advice  
10 at every step of the way. The draft report was maintained confidentially throughout the drafting  
11 process. Each non-attorney involved with drafting the report did so at the direction, and under the  
12 supervision, of counsel.

3. I have reviewed the document identified in the privilege log as  
4 JCCP\_MDL\_PRIVLOG015009. It is a draft Executive Summary for Uber's Safety Report dated  
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November 12, 2019 that is marked “Attorney-Client Privileged and Confidential/Prepared at the direction of counsel.” This draft document discusses Uber’s safety policies and practices. Given the legal risks of public statements regarding safety issues, a team of Uber’s in-house attorneys, including myself, directed and coordinated the drafting of the Safety Report, including the Executive Summary. Uber’s in-house attorneys directed and coordinated this effort to facilitate the provision of legal advice on the statements in the then draft report. Uber’s in-house attorneys did, in fact, provide legal advice at every step of the way. The draft report was maintained confidentially throughout the drafting process. Each non-attorney involved with drafting the report did so at the direction, and under the supervision, of counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Denver, Colorado on March 17, 2025.

By: Jennifer Handley

Jennifer Handley